Remarks

Claims 1-21 are pending.

Objections to the Specification

The Specification has been amended to correct the informalities noted by the Office at page 2 of the pending Action along with the errors noted in Applicants review.

Objections to the Claims

Claim 12 has been amended to correct the informality noted by the Office at page 3 of the Action.

Clarifying Amendments

Claim 1 has been amended to recite that the media parameters are downloaded to the imaging device and that the imaging device is automatically configured based on those media parameters. The amendment to Claim 1 is not necessary to distinguish the cited references. Indeed, the Office seems to have interpreted the original claim language consistent with the amendment. The amendment is made simply to better define the scope of the claimed subject matter.

Similar amendments have been made to Claims 5, 8-12, 14 and 20.

Rejections Based On Miyakawa

Claims 1-14 were rejected under Section 103 as being obvious over Miyakawa (4617580) in view of Furman (5483653) (Claims 1-8 and 11-14) and further in view of Kamada (6128098) (Claims 9-10). The rejections are based on the assertion that Miyakawa teaches an imaging device detecting a media ID from print media and downloading a set of media parameters corresponding to the Media ID in response to detecting the ID. This assertion is not correct. (Furman is cited as teaching an imaging device connected to a server.)

To support the rejection, Miyakawa must teach or suggest the following limitations from Claim 1.

1. detecting a media ID.
2. downloading a set of media paramaters.
3. the media parameters correspond to the media ID.
4. the media parameters are downloaded in response to detecting the media ID.

Downloading A Set Of Media Parameters

In support of the rejection, the Office states that "media parameters represented by data #35 [in Miyakawa] ... downloaded into computer memory #33 from external data #34." Office Action, pages 3-4. First, Miyakawa does not teach or suggest that recorded data 35 is downloaded from external data 34 or from anything else.[1] On the contrary, it seems clear from the characterization of this element as "recorded" data 35 at a RAM address that this data is not downloaded from an external device. Second, Miyakawa does not teach or suggest that recorded data 35 includes a set of media parameters. Miyakawa does not say anything about the content or character or recorded data 35 (other than that it is "recorded" data). If the Office disagrees, it is respectfully requested to specifically point out and explain the language in Miyakawa that might somehow be reasonably interpreted as teaching or even suggesting that recorded data 35 is downloaded from an external device and that recorded data 35 includes a set of media parameters. Absent such a showing, the rejection of Claim 1 should be withdrawn.

The Media Parameters Correspond To The Media ID

Even if it is assumed for purposes of argument only that recorded data 35 in Miyakawa might somehow reasonably be deemed to include a set of media parameters, there is no teaching or suggestion that any such media parameters correspond to the media ID.[2] The Office has made no specific assertion or showing to the contrary. Absent such a showing, the rejection of Claim 1 should be withdrawn.

The Media Parameters Are Downloaded In Response To Detecting The Media ID

Even if it is assumed for purposes of argument only that recorded data 35 in Miyakawa might somehow reasonably be deemed to include a set of media parameters and that recorded data 35 is downloaded from an external device, there is no teaching

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1   Data cannot be downloaded from data. Applicants have interpreted the Office's remarks, therefore, as asserting that recorded data 35 is downloaded from a device external to Miyakawa's inkjet printer.

2   Overhead film detector 39 in Miyakawa "determines whether the recording medium is an OHP film." Miyakama, column 3, lines 47-48. In the specific embodiment described, film detector 39 includes a pair of photo-sensors 64 that discriminate between light blocking paper and light transmitting OHP film. Miyakama, column 5, lines 7-18. Overhead film detector 39 in Miyakawa detects a media parameter (opacity/transparency). Applicants have assumed for purposes of argument only, but without conceding, that this media parameter is the claimed media ID.

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or suggestion that any such media parameters are downloaded in response to detecting the media ID. The Office has made no specific assertion or showing to the contrary. Absent such a showing, the rejection of Claim 1 should be withdrawn.

Claims 5 and 11, which are device and computer readable medium counterparts to method Claim 1, contain similar limitations. For the reasons noted above, therefore, the rejections of Claims 5 and 11 should also be withdrawn along with the rejection of dependent claims 2-4, 6-10 and 12-14.

Rejections Based On Kamada -- Server Method Claims 15-19

Claims 15-19 were rejected under Section 103 as being obvious over Kamada (6128098) in view of Mestha (6757076). The rejections of Claims 15-19 are based on the assertion that Kamada teaches a server receiving a media parameter request from an imaging device with a media ID that corresponds to print media, determining a set of media parameters that correspond to the media ID, and downloading the media parameters to the imaging device. This assertion is not correct. (Mestha is cited as teaching the use of a look-up table to determine the media parameters.)

Fig. 34 in Kamada shows a method for calibrating an inkjet printer upon the installation of new printheads. In steps S3409 and S3410, cited by the Office, the printer, at the command of the host processor, scans a printed test pattern and transmits the scan data to the host processor. The host processor does not receive any kind of a media ID or media parameter request message from the printer. The host processor does not determine a set of media parameters that correspond to the media ID (or any other media parameters). The host processor does not download any media parameters to the printer.

The Office states that the "optical density of the image on a particular medium" is an example of a media parameter because it is dependent on "the absorption and type of the media", citing to Kamada column 13, lines 38-44 and column 41, lines 25-30. Even if the optical density of a printhead in the inkjet printer might somehow be considered a media parameter (as opposed to a printer parameter as expressly taught by Kamada), it is not determined by the host processor; nor is it downloaded to the printer by the host processor; nor is it determined in response to the host processor

receiving a request message from the printer, nor does it correspond to a media ID. Again, if the Office disagrees, it is respectfully requested to specifically point *and explain* the language in Kamada that comes anywhere near to suggesting these claim limitations. Absent such a showing, the rejection should be withdrawn. (It is interesting to note that the Office asserts in the rejection of Claim 20 that Kamada teaches the printer sending the optical density "media parameter" to the host processor, rather than the host processor downloading this so-called media parameter to the printer.)

The rejections of Claims 16-19 depending from Claim 15 should be withdrawn for these same reasons.

Rejections Based On Kamada — System Claims 20-21

Claims 20-21 were rejected under Section 103 as being obvious over Kamada, Ueda (5801722) and Mestha. In support of the rejection, the Office asserts that Kamada teaches an imaging device configured to download a set of media parameters corresponding to a media ID from a server computer to the imaging device and automatically configure imaging operations based on those media parameters. This assertion is not correct. (Ueda is cited as teaching detecting a media ID. Mestha is cited as teaching an imaging device connected to a server.)

Fig. 34 in Kamada shows a method for calibrating an inkjet printer upon the installation of new printheads. In steps S3409 and S3410, cited by the Office, the printer, at the command of the host processor, scans a printed test pattern and transmits the scan data to the host processor. The Office states that the "optical density of the image on a particular medium" is an example of a media parameter because it is dependent on "the absorption and type of the media", citing to Kamada column 13, lines 38-44 and column 41, lines 25-30. Even if the optical density of a printhead in the inkjet printer might somehow be considered a media parameter, it is not downloaded to the printer from the host processor; nor does it correspond to a media ID (even assuming Oeda teaches a media ID). In fact, Kamada expressly teaches the optical density is a printer parameter and, therefore, it is not and cannot correspond to a media ID. If the Office disagrees, it is respectfully requested to specifically point *and explain* the language in Kamada that comes anywhere near to

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suggesting these claim limitations. Absent such a showing, the rejection should be withdrawn along with the rejection of depending Claim 21.

Further with regard to Claim 21, Kamada does not teach the added server limitations as explained in detail above with regard to Claim 15.

The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,

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